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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 4:22-CR-00104-YGR
)	
Plaintiff,)	STIPULATION TO CONTINUE STATUS
)	CONFERENCE AND TO EXCLUDE TIME FROM
v.)	MAY 11, 2022 TO JUNE 15, 2022 AND
)	[PROPOSED] ORDER
ENRIQUE CHAVEZ,)	
)	
Defendant.)	

This matter is currently set for a status conference on May 11, 2022. To provide adequate time for the defense to review discovery already produced, for the government to obtain and produce additional discovery, and for the parties to engage in discussions regarding a potential resolution of this case, the parties hereby request that the status conference be continued to June 15, 2022.

The parties stipulate and agree that excluding time until June 15, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from May 11, 2022 through June 15, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from
Stip. to Continue Status Conference and Exclude Time and [Proposed] Order
Case No. CR 22-104-YGR

1 counsel for the defendant to file this stipulation and proposed order.

2
3 IT IS SO STIPULATED.

4 DATED: May 4, 2022

/s/ Andrew Paulson
ANDREW PAULSON
Assistant United States Attorney

6 DATED: May 4, 2022

/s/ Steven Kalar
STEVEN KALAR
Counsel for Defendant Enrique Chavez

8
9 **[PROPOSED] ORDER**

10 The Court hereby continues the status conference in this matter to June 15, 2022 at 2:00 p.m.
11 Additionally, based upon the facts set forth in the stipulation of the parties and the representations made
12 to the Court, and for good cause shown, the Court finds that failing to exclude the time from May 11,
13 2022 through June 15, 2022 would unreasonably deny defense counsel and the defendant the reasonable
14 time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
15 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from
16 May 11, 2022 through June 15, 2022 from computation under the Speedy Trial Act outweigh the best
17 interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties,
18 IT IS HEREBY ORDERED that the time from May 11, 2022 through June 15, 2022 shall be excluded
19 from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

20 IT IS SO ORDERED.

21
22 DATED: 5/4/2022

HONORABLE YVONNE GONZALEZ ROGERS
United States District Judge